

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SIMO HOLDINGS INC.

Plaintiff,

CIVIL ACTION NO. 18CV5427 (JSR)

-v-

HONG KONG UCLOUDLINK NETWORK
TECHNOLOGY LIMITED, AND
UCLOUDLINK (AMERICA), LTD.

Defendants.

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**DECLARATION OF PETER E. SOSKIN IN SUPPORT OF
PLAINTIFF SIMO HOLDINGS INC.'S OPPOSITION TO DEFENDANTS' MOTION
TO EXCLUDE THE TESTIMONY OF CHRISTOPHER MARTINEZ**

I, PETER E. SOSKIN, declare that the following is true and correct:

1. I am an associate at K&L Gates, LLP, counsel to Plaintiff SIMO Holdings Inc. ("SIMO") in this action. I am admitted *pro hac vice* to practice in this Court, and I am familiar with the facts and circumstances set out herein. I submit this Declaration in support of SIMO's opposition to Defendants' Motion to Exclude the Testimony of Christopher Martinez.

2. Annexed hereto as **Exhibit 1** is a true and correct copy of relevant portions of the Expert Rebuttal Report of John Hansen, dated February 1, 2019.

3. Annexed hereto as **Exhibit 2** is a true and correct copy of relevant portions of the deposition transcript of John Hansen, taken in this matter on February 13, 2019.

4. Annexed hereto as **Exhibit 3** is a true and correct copy of the document produced at Bates No. SIMO_0172774-77.

5. Annexed hereto as Exhibit 4 is a true and correct copy of the document produced at Bates No. SIMO_172788-804.

6. Annexed hereto as Exhibit 5 is a true and correct copy of the document produced at Bates No. SIMO_0041994-08.

7. Annexed hereto as Exhibit 6 is a true and correct copy of U.S. Patent No. 9,736,689.

8. Annexed hereto as Exhibit 7 is a true and correct copy of relevant portions of the deposition transcript of Christopher Martinez, taken in this matter on February 5, 2019.

9. Annexed hereto as Exhibit 8 is a true and correct copy of Exhibit 5 to the Expert Report of Christopher Martinez, produced at Bates No. SIMO_0016415-23.

10. Annexed hereto as Exhibit 9 is a true and correct copy of Exhibit 6 to the Expert Report of Christopher Martinez, produced at Bates No. SIMO_0016531-42.

11. Annexed hereto as Exhibit 10 is a true and correct copy of Exhibit 7 to the Expert Report of Christopher Martinez, produced at Bates No. SIMO_0016577-92.

12. Annexed hereto as Exhibit 11 is a true and correct copy of Exhibit 8 to the Expert Report of Christopher Martinez, produced at Bates No. SIMO_0016661-70.

I declare under penalty of perjury under the laws of the United States of America (28 U.S.C. § 1746) that the foregoing is true and correct.

Dated: April 24, 2019
At: San Francisco, California

/s/Peter E. Soskin
PETER E. SOSKIN, ESQ.